

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

FRONTIER AIRLINES, INC.

Case No.: 1:20-cv-09713-LLS

Plaintiff,

**PLAINTIFF'S AMENDED
DEPOSITION DESIGNATIONS
WITH DEFENDANTS'
OBJECTIONS AND PLAINTIFF'S
RESPONSES**

v.

AMCK AVIATION HOLDINGS IRELAND
LIMITED, ACCIPITER INVESTMENT 4
LIMITED, VERMILLION AVIATION
(TWO) LIMITED, WELLS FARGO TRUST
COMPANY, N.A., solely in its capacity as
OWNER TRUSTEE, and UMB BANK,
N.A., solely in its capacity as OWNER
TRUSTEE,

Defendants.

PLAINTIFF'S AMENDED DEPOSITION DESIGNATIONS

Pursuant to Federal Rule of Civil Procedure 26(a)(3), Plaintiff Frontier Airlines, Inc. submits its Amended Deposition Designations, along with Defendants' Objections and Plaintiff's Responses. Below is the testimony that Frontier expects to present by deposition:

1. Fabian Bachrach – Deposition Date March 15, 2022

Fabian Bachrach Page:Line	Defendants' Objection	Plaintiff's Response
8:22-25		
10:24-11:19		
30:6-32:22		
58:11-17		
74:16-75:20		
8:22-25		
86:11-23		
86:25-87:6		
97:4-98:12		

2. Francis Lee – Deposition Date April 29, 2022

Francis Lee Page:Line	Defendants' Objection	Plaintiff's Response
7:4-7		
7:25-8:1		
8:7-8:12		
10:6-23		
11:10-12:6		
13:11-13:25		
14:18-15:4		
15:14-16:2		
21:25-22:4		
22:6-16		
24:3-25:9		
26:23-28:8		
34:13-35:4		
38:18-39:6		
43:24-45:3		
46:1-47:13		
47:23-49:3		
68:3-16		
70:12-17		
72:1-77:1		
77:13-78:16		
79:2-4		
107:16-108:10		

3. Gerald Ma – Deposition Date April 27, 2022

Gerald Ma Page:Line	Defendants' Objection	Plaintiff's Response
9:16-19		
10:3-4		
10:8-9		
11:12-15		
12:15-23		
13:9-24		
14:4-17		
15:11-14		
16:17-17:6		
18:4-12		
18:22-19:6		
19:10-15		
19:24-20:1		
23:9-24:18		
26:9-27:1	25:18-26:6 should in	Disagree. Move to strike

Gerald Ma Page:Line	Defendants' Objection	Plaintiff's Response
	fairness be included.	as non-responsive.
27:12-14		
28:8-25		
31:10-32:4	32:5-14 should in fairness be included.	Disagree. Move to strike as non-responsive.
40:7-40:22		
41:17-42:7		
46:3-48:1		
55:4-60:19		
60:21-22		
68:9-25		
69:14-70:2		
70:7-74:3		
75:4-76:3		
76:11-77:4		
78:5-23		
80:24-81:14		
83:13-84:2		
84:5-85:7		
85:13-88:11		
92:13-93:24		
96:6-13		
96:24-98:17		
100:13-102:5		
102:16-103:6		
104:23-106:16		
107:21-109:11		
110:16-20		
110:22-111:11		
111:13-24		
115:7-116:23		
117:5-20		
118:6-15		
118:19-120:21		
125:7-10		
125:24-127:2		
131:2-7		
136:20-138:25		
139:9-140:15		
144:12-145:10		
145:14-146:9		
146:25-149:16		
150:13-153:2		
154:1-158:15		

Gerald Ma Page:Line	Defendants' Objection	Plaintiff's Response
158:22-161:10		
162:8-164:6		
165:3-166:1		
168:14-20		
171:2-23		
172:24-173:15		
174:4-175:5		
175:7-176:2		
177:2-177:12		
177:15-178:6		
178:23-179:2		
180:2-181:1		
182:21-183:25		

4. Michael McInerney – Deposition Date March 11, 2022

Michael McInerney Page:Line	Defendants' Objection	Plaintiff's Response
10:1-4		
12:18-14:5		
14:13-15:25		
16:1-16		
19:3-20:21		
21:2-22:1		
23:5-11		
23:22-24:8	23:12-21 should in fairness be included	Disagree. FRE 402 Relevance; FRE 403 Wasting Time.
26:3-17		
27:22-24		
28:23-29:16		
31:21-32:14		
38:14-21		
40:15-21		
42:18-43:15		
50:3-9		
51:5-11	Incomplete question without an answer.	Disagree. 51:5-11 is a preface. The relevant question follows at 52:8-14 (which was designated). FRE 402 Relevance; FRE 403 Wasting Time,

Michael McInerney Page:Line	Defendants' Objection	Plaintiff's Response
		Confusing.
52:8-14		
53:25-54:4		
55:22-56:11		
59:7-60:2		
62:19-25		
63:19-63:24		
66:3-67:12		
69:1-71:6		
71:9-21		
94:25-95:10		
95:15-96:21		
96:23-97:15		
97:18-99:18		
99:20-100:22		
103:4-105:13		
108:21-109:15		
131:24-132:3		
132:5-12		
134:1-19		

5. Ronan Murphy – Deposition Date March 21, 2022

Ronan Murphy Page:Line	Defendants' Objection	Plaintiff's Response
6:9-12		
8:24-10:2		
10:19-11:5		
12:17-25		
16:4-17		
17:22-18:3		
18:7-19:2		
19:5-18		
21:2-4		
21:22-23:2		
26:13-27:7		
51:22-52:10		
55:15-25		
77:6-16	Document discussed has not been identified as a trial exhibit. OK if document is not displayed during testimony.	Will not display document during testimony.

Ronan Murphy Page:Line	Defendants' Objection	Plaintiff's Response
78:4-22	Document discussed has not been identified as a trial exhibit. OK if document is not displayed during testimony.	Will not display document during testimony.
79:18-83:5	Document discussed has not been identified as a trial exhibit. OK if document is not displayed during testimony.	Will not display document during testimony.
92:10-94:25		
106:9-10	Document discussed has not been identified as a trial exhibit. OK if document is not displayed during testimony.	Will not display document during testimony.
108:19-110:24	Document discussed has not been identified as a trial exhibit. OK if document is not displayed during testimony.	Will not display document during testimony.
135:21-136:4	Document discussed has not been identified as a trial exhibit. OK if document is not displayed during testimony.	Will not display document during testimony.
136:20-137:18	Document discussed has not been identified as a trial exhibit. OK if document is not displayed during testimony.	Will not display document during testimony.

6. Jane O'Callaghan – Deposition Date March 23, 2022

Jane O'Callaghan Page:Line	Defendants' Objection	Plaintiff's Response
6:7-11		
7:4-13		

Jane O'Callaghan Page:Line	Defendants' Objection	Plaintiff's Response
9:2-12		
9:22-11:3		
11:7-12:2		
17:4-18:10		
19:19-21:15		
33:6-38:6		
66:4-67:22		
68:7-70:21		
70:22-71:11		
75:25-76:4		
78:12-80:19		
83:12-84:25		
88:5-91:6		
94:3-17	Document discussed has not been identified as a trial exhibit. OK if document is not displayed during testimony.	Will not display document during testimony.
95:16-97:5	Document discussed has not been identified as a trial exhibit	Will not display document during testimony.
97:22-99:4	Document discussed has not been identified as a trial exhibit. OK if document is not displayed during testimony.	Will not display document during testimony.
104:24-106:4	Document discussed has not been identified as a trial exhibit. OK if document is not displayed during testimony.	Will not display document during testimony.
107:25-110:22		
111:5-112:10		
112:17-117:20		
118:14-120:9		
120:20-121:25		
123:15-125:7		
125:8-128:11		
128:23-133:10		
133:13-135:3		

Jane O'Callaghan Page:Line	Defendants' Objection	Plaintiff's Response
137:3-138:4		
138:11-19		
139:4-144:23		
145:8-146:6		
147:12-148:12		
148:19-150:20	Document discussed has not been identified as a trial exhibit. OK if document is not displayed during testimony.	Will not display document during testimony.
151:18-152:8		
153:9-154:8		
161:4-162:19		
170:19-177:4		
180:8-20		
181:10-184:3		
184:15-187:22		
188:2		
194:8-196:3	195:23-196:3 is a question without answer that was withdrawn at 196:6.	Disagree. 195:23-196:3 is a preface. The relevant question follows at 197:8-10 (which was designated). FRE 402 Relevance; FRE 403 Wasting Time, Confusing.
197:8-13		
202:14-18		
204:10-14		
205:18-209:24		
210:4-8		
210:15-24		
211:19		
212:16-216:3	Document discussed has not been identified as a trial exhibit. OK if document is not displayed during testimony.	Will not display document during testimony.
217:2-221:9		
222:9-13		

Jane O'Callaghan Page:Line	Defendants' Objection	Plaintiff's Response
222:24-223:19		
224:21-226:10		
229:4-7		
245:9-247:4	Inadmissible under Federal Rule of Evidence 408.	Disagree. FRE 408 does not preclude this exhibit. Contents of this exhibit are already part of the case record. Any such objection has been waived.
248:18-254:16	Inadmissible under Federal Rule of Evidence 408.	Disagree. FRE 408 does not preclude this exhibit. Contents of this exhibit are already part of the case record. Any such objection has been waived.
256:19-24		
257:2-8		
257:16-259:21		

DATED: April 5, 2024

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